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WSDA Organic Program Cert # 870

Comment to 7 CFR Part 205
(Docket Number: TM-05-14)
RIN 0581-AC57

National Organic Program (NOP)-Access to Pasture (Livestock)

Comments:

Number (4) Finish Feeding for Livestock is not a Stage of Life and Definitely not a natural state for Ruminant Livestock. Further, confinement of the animal, when not necessary for Weather Conditions or Health Reasons is not in keeping with the integrity of the Organic Standards that Consumers Expect from the “Certified Organic Label”.

Number (5) See Comment above. Also, Confinement in a Feedlot is not Natural and **120 Days is Not Short Term and Not a Stage of Life.**

My own Feeling about this proposed rule change is that this is just one more example of Big Business writing the rules to suit their ability to comply for the sake of Profit rather than considering the Animal’s Welfare or Consumer, or Small Farmer that works very hard to adhere to the Standard, as written, for the sake of the customer, the Animal and principal and Integrity of the Organic Program. Nothing in the Proposed rule change is for the Betterment of the Program.